IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

CHICAGO GRAPHIC ARTS HEALTH AND)	
WELFARE PLAN; ROBERT MILLER and)	
JAMES E. MADDEN, in their capacity as)	
Trustees of the Chicago Graphic Arts Health)	
and Welfare Plan, et al.,)	No. 07 C 6287
)	
Plaintiffs,)	
)	Judge Gettleman
V. .)	
)	Magistrate Judge Mason
UNITECH PREPRESS SOLUTIONS, INC.,)	
and ROBERT E. LUDFORD, III, individually.)	
)	
Defendants.)	

AFFIDAVIT OF JAMES THOMOS

STATE OF ILLINOIS)
)
COUNTY OF COOK)

James Thomos, first duly sworn on oath, deposes and states as follows:

- 1. I am employed by the Graphic Communication Conference of the International Brotherhood of Teamsters Supplemental Retirement and Disability Fund (the "Fund"), the plaintiffs in the above referenced action. My responsibilities include oversight of the collection of amounts owed by Unitech Prepress Solutions, Inc. This affidavit is submitted in support of the Fund's motion for a prove up of damages.
- 2. Unitech Prepress Solutions is a signatory employer of an agreement with Local 458M, Graphic Communications Conference of the International Brotherhood of Teamsters, as reflected by the Fund's records. On or after November 14, 2006, the Fund's Trustees issued an award through the grievance hearing held with proper notice on October 23, 2006, which provided for unpaid contributions for certain months from July 2006 to the present and obligated the Company to remain current in its obligation to pay on going contributions. To date, the Company failed to pay current contributions owed to the Fund.

- 3. The Declaration of Trust permits the Trustees to assess interest and establish liquidated damages on delinquent amounts of monies owed and entitles the Trustees to recover all expenses for collection efforts and reasonable attorneys' fees. Interest is assessed at the rate of prime plus one percent per annum, or 8% whichever is greater, and liquidated damages are set at 20% of the unpaid contributions.
- 4. The arbitration award entered on or about November 14, 2006, is attached to the Complaint filed in this case. The Company has made a partial payments to the Fund but has failed to pay delinquencies owed for the period from April 2007 through May 2007. Contributions are owed to the Fund in the amount of \$7,898.58. Liquidated damages and interest is now due the Fund in the amount of \$1,579.72 in damages and \$401.95 in interest. In addition, the Company failed to pay \$220.00 in costs for the arbitration award.

FURTHER AFFIANT SAYETH NOT.

James Thomos

Subscribed and sworn to before me this ______ day of January 2008.

NOTARY PUBLIC

OFFICIAL SEAL
ANNA MARIE FURLANETTO
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES 10/13/09